



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 87 07

UNITED STATES OF AMERICA,
Plaintiff,

v.

Luis OLIVERA (1)
Christina MARHOUN (2)
Danielle SCHOONOVER (3)
Defendants.

Magistrate Case No.:

COMPLAINT FOR VIOLATION OF
21 U.S.C. § 952 and 960
Importation of a Controlled Substance
(Felony)

The undersigned complainant being duly sworn states:

On or about August 7, 2008, within the Southern District of California, defendants Luis OLIVERA, Christina MARHOUN, and Danielle SCHOONOVER did knowingly and intentionally import approximately 34.40 kilograms (75.68 pounds) of marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

Felix J. Castaneda
Special Agent
U.S. Immigration & Customs
Enforcement

SWORN TO, BEFORE ME, AND SUBSCRIBED IN MY PRESENCE THIS 8th
DAY OF August 2008.

Peter C. Lewis
U.S. MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Luis OLIVERA (1)

4 Christina MARHOUN (2)

5 Danielle SCHOONOVER (3)

6 STATEMENT OF FACTS

7 This complaint is based upon the personal observations,
8 investigation and information provided to U. S. Immigration and
9 Customs Enforcement Special Agent Felix Castaneda.

10 On August 7, 2008, Luis OLIVERA, Christina MARHOUN, and
11 Danielle SCHOONOVER entered the United States at the Calexico, CA
12 West Port of Entry. OLIVERA was the driver and MARHOUN and
13 SCHOONOVER were the passengers in a 1998 Chevy Malibu registered
14 to OLIVERA.

15 Customs and Border Protection Officer (CBPO) F. Lopez
16 received a negative Customs declaration from OLIVERA, MARHOUN and
17 SCHOONOVER. During the primary inspection, CBPO Lopez noticed
18 that OLIVERA was avoiding eye contact and was sweating profusely.
19 CBPO Lopez inspected the vehicle and noticed the bottom front
20 bumper screws had been tampered with. CBPO Lopez referred the
21 vehicle to secondary for further inspection.

22 CBPO Cardenas encountered the vehicle in the secondary
23 inspection area. Officer Cardenas noticed that OLIVERA appeared
24 uneasy and was slow to answer questions. Officer Cardenas also
25 noted that MARHOUN and SCHOONOVER would not make eye contact.
26 Officer Taylor then notified Officer Cardenas that his Narcotic
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1 Detector Dog had alerted to the front of the vehicle indicating
2 the presence of the odor of a controlled substance in that area.

3 Further inspection resulted in the discovery of 22 packages
4 wrapped in carbon paper and clear plastic hidden within the front
5 fenders of the vehicle. The packages contained a green leafy
6 substance, which field-tested positive for marijuana. The total
7 weight of the packages was 34.40 kilograms.

8 Agents Castaneda and Douglas Struckmeyer advised OLIVERA and
9 MARHOUN of their rights per Miranda. OLIVERA and MARHOUN stated
10 they understood their rights and were willing to answer questions
11 without the presence of an attorney.

12 OLIVERA stated he knew the vehicle contained marijuana.
13 OLIVERA stated he was hired to drive the vehicle into the United
14 States and was going to be paid \$700.00 for smuggling the
15 marijuana into the United States. OLIVERA stated a man by the
16 name of "Mario" hired him. OLIVERA also stated MARHOUN and
17 SCHOONOVER were aware that there were drugs in the vehicle and
18 they too were going to get paid \$700.00 each. OLIVERA stated he
19 and MARHOUN had smuggled narcotics on four previous occasions.
20 OLIVERA stated SCHOONOVER had smuggled with them.

21 MARHOUN stated she was recruited by OLIVERA who was
22 recruited by a man called "Mario". MARHOUN claimed she had
23 smuggled narcotics with OLIVERA on four prior occasions. MARHOUN
24 stated everyone in the vehicle knew marijuana was concealed in
25 the vehicle, and each were going to be paid \$700.00. MARHOUN
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1 stated SCHOONOVER was recruited by OLIVERA and she had done this
2 on one prior occasion.
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